



Governor

Lori F. Kaplan
Commissioner

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

make Indiana a cleaner, healthier place to live.

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-

6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Woodcrest Manufacturing, Inc.
150 East Washington Avenue
Peru, Indiana 46970**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T103-17193-00027	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 28, 2004 Expiration Date: April 28, 2009



TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)] [326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7- 5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.16	Permit Renewal [326 IAC 2-7-4]	
B.17	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.18	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.20	Source Modification Requirement [326 IAC 2-7-10.5]	
B.21	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
SECTION C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less than One Hundred (100) Pounds per Hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.9	Performance Testing [326 IAC 3-6]	

TABLE OF CONTENTS (Continued)

Compliance Requirements [326 IAC 2-1.1-11]

- C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS - Surface Coating Operations 26

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]
D.1.2 PSD Minor Limit [326 IAC 2-2]
D.1.3 Particulate [40 CFR Subpart P]
D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]
D.1.5 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]
D.1.6 Work Practice Standards [40 CFR 63.803][326 IAC 20-14-1]
D.1.7 Particulate [326 IAC 6-3-2(d)]
D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.9 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63][326 IAC 20-14-1]
D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(a)][326 IAC 8-1-4(a)(3)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.11 Monitoring

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.12 Record Keeping Requirements
D.1.13 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 32

TABLE OF CONTENTS (Continued)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.4 Visible Emissions Notations
- D.2.5 Baghouse Inspections
- D.2.6 Broken or Failed Bag Detection

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.7 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS 35

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]
- D.3.2 Volatile Organic Compounds (VOC)

Certification	36
Emergency Occurrence Report	37
Quarterly Report	39 - 42
Quarterly Deviation and Compliance Monitoring Report	43

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wood furniture manufacturing plant.

Responsible Official:	President
Source Address:	150 East Washington Avenue, Peru, Indiana 46970
Mailing Address:	P.O. Box 848, Peru, Indiana 46970
General Source Phone Number:	(765) 472-4471
SIC Code:	2512
County Location:	Miami
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Major Source, under PSD Rules
	Major Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating line, installed in 1991, designated as SC1, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
 - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
 - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
 - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
 - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.
- (b) One (1) surface coating line, installed in 1993, designated as SC2, coating wood furniture with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.

- (3) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
 - (4) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
- (c) One (1) surface coating line, installed in 1997, designated as SC3, coating wood furniture, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
 - (2) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.
- (d) One (1) surface coating line, installed in 1999, designated as SC4, coating wood furniture, consisting of the following equipment:
 - (1) One (1) flowcoater, identified as EU-02Q, exhausting to one (1) stack, identified as S-02N.
 - (2) One (1) spray booth, identified as EU-02R, utilizing an air assisted airless application system, with particulate matter emissions controlled by dry filters, and exhausting to one (1) stack, identified as S-02O.
- (e) Woodworking operations consisting of the following:
 - (1) Line W-1, installed in 1991, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (2) Line W-2, installed in 1992, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (3) Line W-3, installed in 1994, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (4) Line W-4, installed in 1992, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (5) Line W-5, installed in 1995, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1 or two (2) six bag portable collectors, exhausting to Stack ID BH-1 or general ventilation, respectively; and
 - (6) Line W-6, installed in 1995, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) One natural gas-fired boiler, with a heat input of 1.5 million Btu per hour. [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.1 Definitions [326 IAC 2-7-1]

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

B.3 Enforceability [326 IAC 2-7-7]

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.5 Severability [326 IAC 2-7-5(5)]

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source,

except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC-13-14-2-2, IC-13-14-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC-13-14-2-2, IC-13-14-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC-13-14-2-2, IC-13-14-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC-13-14-2-2, IC-13-14-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use in Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty days (30) of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may

extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a (temperature or flow rate), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures on June 4, 1996.

- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

The OMM Plan shall be submitted with the time frames specified by the applicable 40 CFR 60.63 requirements.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating line, designated as SC1, installed in 1991, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
 - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
 - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
 - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
 - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.
- (b) One (1) surface coating line, designated as SC2, installed in 1993, coating wood furniture with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.
 - (3) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
 - (4) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
- (c) One (1) surface coating line, designated as SC3, installed in 1997, coating wood furniture, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
 - (2) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.
- (d) One (1) surface coating line, designated as SC4, coating wood furniture, installed in 1994, consisting of the following equipment:
 - (1) One (1) flowcoater, identified as EU-02Q, exhausting to one (1) stack, identified as S-02N.
 - (2) One (1) spray booth, identified as EU-02R, utilizing an air assisted airless application system, with particulate matter emissions controlled by dry filters, and exhausting to one (1) stack, identified as S-02O.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to CP 103-2222-00027, issued on January 22, 1992, the use of VOC, including coatings, dilution solvents, and cleaning solvents to surface coating line SC1 (EU-02D, EU-02F, EU-02G, EU-02H), shall not exceed 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

The use of VOC, including coatings, dilution solvents, and cleaning solvents to surface coating line SC2 (EU-02A, EU-02I, EU-02C, EU-X) shall not exceed 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Pursuant to CP103-8824-00027, issued on November 18, 1997, the use of VOC, including coatings, dilution solvents, and cleaning solvents input to surface coating line SC3 (EU-BB and EU-02N) shall not exceed 40 tons, per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

Pursuant to SSM 103-10720-00027, issued June 9, 1999, the use of VOC, including coatings, dilution solvents, and cleaning solvents to surface coating line SC4 (EU-02Q and EU-02R) shall not exceed 40 tons, per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate [40 CFR Subpart P]

Pursuant to 40 CFR Subpart P, the particulate emission rate from the five paint booths (EU-02F, EU-02G, EU-02H, EU-02C, EU-02R) shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.5 Wood Furniture Manufacturing Operations NESHAP [326 IAC 20-14-1] [40 CFR Part 63, Subpart JJ]

- (a) The wood furniture coating operations are subject to 40 CFR Part 63, Subpart JJ, which is incorporated by reference as 326 IAC 20-14-1, with a compliance date of December 7, 1998. A copy of this rule is attached.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pounds VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
 - (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.6 Work Practice Standards [40 CFR 63.803] [326 IAC 20-14-1]

The Permittee of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP103-2222-00027, CP103-4481-00027, and CP103-8824-00027, issued on January 22, 1992, April 24, 1995, and November 18, 1997, respectively, and 326 IAC 6-3-2(d), particulate from the five paint booths (EU-02F, EU-02G, EU-02H, EU-02C, and EU-02R), shall be controlled by dry filters, and the Permittee shall operate the dry filters in accordance with manufacturer's specifications.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63] [326 IAC 20-14-1]

- (1) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.
- (2) IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(a)][326 IAC 8-1-4(a)(3)]

Compliance with the VOC content and usage limitations contained in Condition D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Repairs shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Repairs shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC usage for each month.
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

- (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
 - (d) To document compliance with Condition D.1.12, the Permittee shall maintain a log of daily overspray observations, weekly and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
 - (2) July 1 through December 31.
- (c) The reports required in (b) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (e) Woodworking operations consisting of the following:
- (1) Line W-1, installed in 1991, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (2) Line W-2, installed in 1992, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (3) Line W-3, installed in 1994, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (4) Line W-4, installed in 1992, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (5) Line W-5, installed in 1995, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, or two (2) six bag portable collectors, exhausting to Stack ID BH-1 or general ventilation, respectively; and
 - (6) Line W-6, installed in 1995, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following line shall not exceed the allowable shown when the line operates at its maximum process weight rate as shown:

Woodworking Line	Maximum Process Weight Rate (lbs/hr)	Allowable Particulate Emissions (lbs/hr)
W-1	4050	6.6
W-2	1416	3.3
W-3	1789	3.8
W-4	654	1.9
W-5	3152	5.6
W-6	2684	5.0

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

Pursuant to 40 CFR 64 and in order to comply with Condition D.2.1, the baghouse BH-1 shall be in operation at all times when Lines W-1 through W-6 are operating and the two (2) six bag portable collectors for particulate matter control shall be in operation at all times when Line W-5 is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations [40 CFR 64]

Pursuant to 40 CFR 64 (CAM), the Permittee shall comply with the following requirements:

- (a) Daily visible emission notations of the woodworking stack exhaust BH-1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.2.5 Baghouse Inspections [40 CFR Part 64]

Pursuant to 40 CFR 64 (CAM), an inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection [40 CFR Part 64]

Pursuant to 40 CFR 64 (CAM), in the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) Pursuant to 40 CFR 64 (CAM), to document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the woodworking stack exhaust BH-1.
- (b) Pursuant to 40 CFR 64 (CAM), to document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) One natural gas-fired boiler, with a heat input of 1.5 million Btu per hour.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 1.5 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☒ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ☒ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027
Facility: Line SC1
Parameter: VOC Usage
Limit: 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027
Facility: Line SC2
Parameter: VOC Usage
Limit: 250 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027
Facility: Line SC3
Parameter: VOC Usage
Limit: 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027
Facility: Line SC4
Parameter: VOC Usage
Limit: 40 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Woodcrest Manufacturing, Inc.
Source Address: 150 East Washington Avenue, Peru, Indiana 46970
Mailing Address: P.O. Box 848, Peru, Indiana 46970
Part 70 Permit No.: T103-17193-00027

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Issued April 28, 2004

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
for a Title V Operating Permit Renewal**

Source Background and Description

Source Name: Woodcrest Manufacturing, Inc.
Source Location: 150 East Washington Avenue, Peru, Indiana 46970
County: Miami
SIC Code: 2512
Operation Permit No.: T103-17193-00027
Permit Reviewer: ERG/TDP

On January 14, 2004, the Office of Air Quality (OAQ) had a notice published in the Peru Tribune, Peru, Indiana, stating that Woodcrest Manufacturing, Inc. had applied for a Title V Operating Permit Renewal to operate a stationary wood furniture manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. Condition D.2.3 has been modified for clarification:

D.2.3 Particulate Matter (PM)

Pursuant to 40 CFR 64 and in order to comply with Condition D.2.1, the baghouse BH-1 **shall be in operation at all times when Lines W-1 through W-6 are operating** and ~~the~~ two (2) six bag portable collectors for particulate matter control shall be in operation at all times when Lines W-4 through W-6 ~~are~~ **is** in operation and exhausting to the outside atmosphere.

2. IDEM, OAQ has noted that, per inspections conducted in August 2002, the Preventative Maintenance Plans submitted on June 4, 1996 have not been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventative Maintenance Plans), as indicated in the TSD. However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

3. Condition D.1.9 has been modified to clarify that this source is an existing source:

D.1.9 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63] [326 IAC 20-14-1]

- (1) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) ~~or 63.804(d)(3) or 63.804(e)(2)~~, performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

4. For clarification, an additional rule citation has been added to Condition B.21.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

5. The name "source" was changed to "Permittee" in Conditions C.9, C.15, and C.20.

C.9 Performance Testing [326 IAC 3-6]

...

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. The notification requirement in C.16 has been modified to provide OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. Condition C.16 has been revised as follows:

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

...

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

...

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten (10)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the **response** actions taken up to the time of notification.

issued April 28, 2004

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Operating
Permit Renewal**

Source Background and Description

Source Name: Woodcrest Manufacturing, Inc.
Source Location: 150 East Washington Avenue, Peru, Indiana 46970
County: Miami
SIC Code: 2512
Operation Permit No.: T103-17193-00027
Permit Reviewer: ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 renewal permit application from Woodcrest Manufacturing, Inc. relating to the operation of a stationary wood furniture manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) surface coating line, designated as SC1, installed in 1991, coating wood furniture with a maximum capacity of 107.5 units per hour, consisting of the following equipment:
 - (1) One (1) flowcoating booth, identified as EU-02D, and exhausting to Stack ID S-02D.
 - (2) One (1) spray booth, identified as EU-02F, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02F.
 - (3) One (1) spray booth, identified as EU-02G, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02G.
 - (4) One (1) spray booth, identified as EU-02H, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02H.
- (b) One (1) surface coating line, designated as SC2, installed in 1993, coating wood furniture with a maximum capacity of 18.74 units per hour, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-02A, and exhausting to general ventilation.
 - (2) One (1) dip tank, identified as EU-02I, and exhausting to general ventilation.

- (3) One (1) dip tank, identified as EU-X, with a maximum capacity of 6.25 units per hour, and exhausting to general ventilation.
 - (4) One (1) spray booth, identified as EU-02C, utilizing an air assisted airless application system, with dry filters as control for particulate matter overspray, and exhausting to Stack ID S-02C.
- (c) One (1) surface coating line, designated as SC3, installed in 1997, coating wood furniture, consisting of the following equipment:
 - (1) One (1) dip tank, identified as EU-BB, with a maximum capacity of 16.25 units per hour, and exhausting to general ventilation.
 - (2) One (1) flowcoating booth, identified as EU-02N, with a maximum capacity of 8.13 units per hour, and exhausting to Stack ID S-01.
- (d) One (1) surface coating line, designated as SC4, installed in 1999, coating wood furniture, consisting of the following equipment:
 - (1) One (1) flowcoater, identified as EU-02Q, exhausting to one (1) stack, identified as S-02N.
 - (2) One (1) spray booth, identified as EU-02R, utilizing an air assisted airless application system, with particulate matter emissions controlled by dry filters, and exhausting to one (1) stack, identified as S-02O.
- (e) Woodworking operations consisting of the following:
 - (1) Line W-1, installed in 1991, with a maximum capacity of 4050 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (2) Line W-2, installed in 1992, with a maximum capacity of 1416 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (3) Line W-3, installed in 1994, with a maximum capacity of 1789 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (4) Line W-4, installed in 1992, with a maximum capacity of 654 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1;
 - (5) Line W-5, installed in 1995, with a maximum capacity of 3152 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1 or two (2) six bag portable collectors, exhausting to Stack ID BH-1 or general ventilation, respectively; and
 - (6) Line W-6, installed in 1995, with a maximum capacity of 2684 pounds per hour, which has emissions controlled by one (1) baghouse, identified as BH-1, exhausting to Stack ID BH-1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including:
 - (1) One natural gas-fired boiler, with a heat input of 1.5 million Btu per hour. [326 IAC 6-2-4]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) Title V Operating Permit 103-6056-00027, issued on October 7, 1998.
- (b) First Minor Permit Modification 103-10266-00027, issued on March 2, 1999.
- (c) Significant Source Modification 103-10720-00027, issued on June 9, 1999.
- (d) First Administrative Amendment 103-10816-00027, issued on June 29, 1999.
- (e) First Reopening 103-13425-00027, issued on January 4, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

Condition D.2.1: Particulate Matter (PM) [326 IAC 6-3]

Reason for revision: The particulate emissions limitations established in Condition D.2.1 were previously based on the combined process weight rates from the woodworking lines W-1 through W-6 as they exhausted to either the baghouse, BH-1, or the six bag portable collectors. These limitations have been revised to reflect the allowable emissions for each woodworking line based on the maximum process weight rate of that line, regardless of what control device it exhausts to.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

Condition D.3.4: Halogenated Solvent Cleaning NESHAP [326 IAC 20-6-1] [40 CFR 63.460]

Reason not incorporated: Condition D.3.4 limited the Permittee from using cleaning agents with halogenated HAPs to ensure that the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.460 (Halogenated Cleaning Solvents) would not apply to the degreasing

operations. However, the source has never used cleaning solvents that contain the halogenated HAPs defined in 40 CFR 63.460, therefore, this condition is not required.

Condition D.3.6: Particulate Matter (PM) [326 IAC 6-3]

Reason not incorporated: The grinding and machining operations previously described in the Part 70 permit are actually maintenance activities defined as trivial activities under 326 IAC 2-7-1(40)(E). Therefore, pursuant to the revised 326 IAC 6-3 rule, this condition was removed from the permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 renewal permit application for the purposes of this review was received on December 17, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A for detailed emission calculations (pages 1 through 5).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Title V permit.

Pollutant	Potential To Emit (tons/year)
PM	>250
PM-10	>250
SO ₂	<100
VOC	>250
CO	<100
NO _x	<100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	> 10
Toluene	>10
Methyl Isobutyl Ketone	>10
Methanol	>10
Formaldehyde	<10
Glycol Ethers	>10

TOTAL	>25
-------	-----

- (a) The unrestricted emissions of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	13
SO ₂	--
VOC	125
CO	--
NO _x	--

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coating Line SC1	4.03	4.03	0	less than 250	0	0	77.2
Coating Line SC2	0.31	0.31	0	less than 250	0	0	55.9
Coating Line SC3	0.10	0.10	0	less than 40	0	0	0
Coating Line SC4	0.09	0.09	0	less than 40	0	0	5.2
Woodworking	69.6	69.6	0	0	0	0	0
Total Emissions	74.1	74.1	0	less than 576.0	0	0	138.3

County Attainment Status

The source is located in Miami County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Miami County has been classified as attainment or unclassifiable for PM10, SO2, NO2, CO, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

The 1.5 MMBtu/hr natural gas fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, subpart Dc), because the heat input capacity of the boiler is less than 10 MMBtu/hr. There are no other New Source Performance Standards (326 IAC 12) applicable to this source.

- (b) The degreasing station is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because the solvents listed in 40 CFR 63.460(a) are not used.
- (c) The surface coating facilities are subject to the National Emission Standards for Hazardous Air Pollutants (326 IAC 14, (40 CFR 63.800, Subpart JJ).

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

The coating operations are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) because the source participates in the manufacture of wood furniture as defined in the rule and the source is major for HAPs. Pursuant to this rule, the wood furniture coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) for new source pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) for new source pound VHAP per pound solids.
 - (C) Use a control device to limit emissions to one (1.0) for new source pound VHAP per pound solids.

- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The Permittee of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:
 - (A) Operator training course.
 - (B) Leak inspection and maintenance plan.
 - (C) Cleaning and washoff solvent accounting system.
 - (D) Chemical composition of cleaning and washoff solvents.
 - (E) Spray booth cleaning.
 - (F) Storage requirements.
 - (G) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
 - (H) Line cleaning.
 - (I) Gun cleaning.
 - (J) Washoff operations.
 - (K) Formulation assessment plan for finishing operations.
- (d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.
- (e) This source is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

The woodworking operations, identified as Line W-1, Line W-2, Line W-3, Line W-4, Line W-5, and Line W-6, each have the potential to emit, before controls, of greater than one hundred (100) tons per year of particulate. Additionally, 326 IAC 6-3-2 (Process Operations) provides a particulate emission limitation for each operation. The baghouse, identified as BH-1, and two (2) portable six pack dust collectors, are used to comply with these limits. Therefore, CAM applies to the woodworking operations. Since the post-control emissions from these units are less than one hundred percent of the amount

necessary to be classified as a major source, these units are considered "other pollutant-specific emission units" as described in 40 CFR 64.51(b).

Since these operations are considered "other pollutants-specific emission units" a CAM plan was required to be submitted along with the renewal application.

The source submitted a CAM plan on September 18, 2003. The CAM plan suggested that the following be considered CAM: daily visible emission notations and baghouse and portable dust collector inspections. IDEM agrees that daily visible emission notations and inspections are considered CAM and those requirements have been included in the permit.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on June 4, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on June 4, 1996. The plan was updated in 1999.

326 IAC 2-4.1(Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants), although the surface coating lines SC3 and SC4 were constructed after July 27, 1997, because these units are subject to the National Emission Standards for Wood Furniture Manufacturing Operations (326 IAC 14, (40 CFR 63.800, Subpart JJ)).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Surface Coating

326 IAC 2-2 (Prevention of Significant Deterioration)

The source is not one of the 28 listed source categories. The source was an existing minor source when it was built in 1991. Pursuant to T103-6056-00027, the source accepted a limit on the potential to emit VOC from surface coating line SC1 to less than 250 tons per twelve (12) month

rolling consecutive period with compliance determined at the end of each month. Therefore, the surface coating line, woodworking equipment, and natural gas fired boiler did not emit any pollutant at or above the major source threshold of 250 tons per year. In 1993, surface coating line SC2 was constructed. The potential VOC emissions from SC2 were 502 tons per year. The source agreed to accept a limit on surface coating line SC2 of less than 250 tons per twelve (12) month rolling consecutive period to ensure that PSD did not apply to the modification, but became a major PSD source. In 1997, the surface coating line SC3 was constructed. Because the source was major for PSD, SC3 was limited to less than 40 tons per twelve (12) month rolling consecutive period. In 1999, surface coating line SC4 was constructed. The VOC emissions from SC4 were limited to less than 40 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This source is not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) although it was constructed after January 1, 1980, because it is subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 325 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR Subpart P, the particulate matter (PM) from the five paint booths (EU-02F, EU-02G, EU-02H, EU-02C, and EU-02R) shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Under the rule revision, particulate from the surface coating shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

State Rule Applicability - Woodworking Equipment

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate emission rate from the following line shall not exceed the allowable shown when the line operates at its maximum process weight rate as shown:

Woodworking Line	Maximum Process Weight Rate (lbs/hr)	Allowable Particulate Emissions (lbs/hr)
W-1	4050	6.6
W-2	1416	3.3
W-3	1789	3.8
W-4	654	1.9
W-5	3152	5.6
W-6	2684	5.0

The pounds per hour limitations were calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

State Rule Applicability - 1.5 MMBtu/hr Natural Gas Fired Boiler

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 1.5 MMBtu per hour boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where P_t = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour heat input (1.5 MMBtu/hr)

$$P_t = \frac{1.09}{1.5^{0.26}}$$

$$P_t = 0.98$$

Pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 pounds per MMBtu heat input. Therefore, the 1.5 MMBtu/hr natural gas fired boiler shall be limited to 0.6 pounds per MMBtu heat input. Based on AP-42 emission factors, the boiler can comply with 326 IAC 6-2-4.

State Rule Applicability - Degreasing Operations

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

The cold cleaner degreasing operation, which was constructed in 1988, shall comply with the requirements of 326 IAC 8-3-2. The Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Organic Solvent Degreasing Operations)

The cold cleaner degreasing operation is not subject to 326 IAC 8-3-5 because it was constructed in 1988, prior to the July 1, 1990 applicability date.

Testing Requirements

Testing is required for the wood furniture coating operations in accordance with 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray booths from surface coating lines SC1 through SC4, including EU-02F, EU-02G, EU-02H, EU-02C, and EU-02R, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

These monitoring conditions are necessary because the dry filters ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

2. The woodworking operations have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the woodworking stack exhaust BH-1 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) An inspection shall be performed within the last month of each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

- (c) In the event that bag failure has been observed:

For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible

emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of an response actions taken up to the time of notification.

These monitoring conditions are necessary because the baghouse BH-1 and the two (2) six-bag portable collectors must operate properly to ensure compliance with 40 CFR 64 (CAM) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this stationary wood furniture manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T103-17193-00027.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Page 1 of 5 TSD App A

Company Name: Woodcrest Manufacturing, Inc.
Address City IN Zip: 150 E. Washington St., Peru, Indiana
Permit No.: T103-17193-00027
Plt ID: 103-00027
Reviewer: ERG/TDP
Date: June 3, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	PM/PM10 Potential ton/yr	Transfer Efficiency
Line SC1:															
Unit ID EU-02D															
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.134700	107.47	6.56	6.56	94.96	2279.13	415.94	0.00	100%
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.025600	107.47	7.15	7.15	19.67	472.06	86.15	0.00	100%
Unit ID EU-02F															
Lacquer Sealer	7.56	73.15%	0.0%	73.2%	0.0%	20.80%	0.067800	107.50	5.53	5.53	40.31	967.35	176.54	22.68	65%
Unit ID EU-02G															
Gloss Varnish	7.61	63.86%	0.0%	63.9%	0.0%	27.66%	0.079700	107.50	4.86	4.86	41.64	999.29	182.37	36.12	65%
Unit ID EU-02H (Operating Scenario #1)															
Gloss Varnish	7.61	63.86%	0.0%	63.9%	0.0%	27.66%	0.079700	107.50	4.86	4.86	41.64	999.29	182.37	36.12	65%
Unit ID EU-02H (Operating Scenario #2)															
G.W. Borne Enamel	9.03	59.84%	48.1%	11.7%	52.1%	33.31%	0.140800	107.50	2.22	1.06	16.05	385.10	70.28	84.15	65%
B.W. Borne Enamel	8.75	61.56%	49.1%	12.5%	51.6%	32.63%	0.151600	107.50	2.25	1.09	17.77	426.43	77.82	84.03	65%
R.W. Borne Enamel	8.66	64.81%	51.3%	13.5%	53.3%	30.63%	0.079700	107.50	2.51	1.17	10.02	240.58	43.91	40.03	65%
Subtotal												238.21	5717.12	1043.38	267.01
Line SC3:															
Unit ID EU-02N															
Provencial Oil Stain	6.7	78.90%	0.0%	78.9%	0.0%	16.30%	0.152560	8.13	5.29	5.29	6.56	157.36	28.72	0.00	100%
Unit ID BB															
Provencial Oil Stain	6.7	78.90%	0.0%	78.9%	0.0%	16.30%	0.060345	16.25	5.29	5.29	5.18	124.41	22.70	0.00	100%
Subtotal												11.74	281.77	51.42	0.00
Line SC2:															
Unit ID EU-02A															
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.044000	18.74	7.15	7.15	5.89	141.48	25.82	0.00	100%
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.231000	18.74	6.56	6.56	28.40	681.55	124.38	0.00	100%
Unit ID EU-02I															
W.C. Hazewood Stain	7.34	97.40%	0.0%	97.4%	0.0%	1.00%	0.044000	18.74	7.15	7.15	5.89	141.48	25.82	0.00	100%
Kwik Dry 66	6.56	100.00%	0.0%	100.0%	0.0%	0.00%	0.231000	18.74	6.56	6.56	28.40	681.55	124.38	0.00	100%
Unit ID EU-02C															
Gloss Varnish	7.61	63.86%	0.0%	63.9%	0.0%	27.66%	0.064000	18.74	4.86	4.86	5.83	139.89	25.53	5.06	65%
Lacquer Sealer	7.56	73.15%	0.0%	73.2%	0.0%	20.80%	0.057000	18.74	5.53	5.53	5.91	141.77	25.87	3.32	65%
Unit ID X															
Provencial Oil Stain	6.7	78.90%	0.0%	78.9%	0.0%	16.30%	0.129672	6.25	5.29	5.29	4.28	102.82	18.77	0.00	100%
Subtotal												84.61	2030.53	370.57	8.38

The transfer efficiencies for the surface coating operations are from the Binks Training Division document *High Volume Low Pressure - HVLP*.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PM/PM10 Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Woodcrest Manufacturing, Inc.
Address City IN Zip: 150 E. Washington St., Peru, Indiana
Permit No.: T103-17193-00027
Plt ID: 103-00027
Reviewer: ERG/TDP
Date: June 3, 2003

Line SC4															
Unit ID EU-02Q															
Hazelwood Stain	6.78	90.86%	0.0%	90.9%	0.0%	5.37%	0.043500	30.00	6.16	6.16	8.04	193.03	35.23	0.00	100%
Mineral Spirits	6.42	100.00%	0.0%	100.0%	0.0%	0.00%	0.063800	30.00	6.42	6.42	12.29	294.91	53.82	0.00	100%
Unit ID EU-02R															
Sealer	7.39	68.06%	0.0%	68.1%	0.0%	27.40%	0.04550	30.00	5.03	5.03	6.87	164.87	30.09	4.94	65%
Varnish	7.6	63.86%	0.0%	63.9%	0.0%	27.66%	0.04650	30.00	4.86	4.86	6.77	162.59	29.67	5.87	65%
Subtotal												33.97	815.39	148.81	10.81
Total Potential Emissions												368.53	8844.82	1614.18	286.20

x (1 - 0.80) With 80% contr
14.31 due to dry filte

The transfer efficiencies for the surface coating operations are from the Binks Training Division document *High Volume Low Pressure - HVLP*.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
PM/PM10 Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

HAP Emission Calculations

Company Name: Woodcrest Manufacturing, Inc.
Address : 150 E. Washington St., Peru, Indiana
Title V Permit No.: T103-17193-00027
Pit ID: 103-00027
Reviewer: ERG/TDP
Date: June 3, 2003

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximu m (unit/hou r)	Weight % Xylene	Weight % Toluene	Weight % Formaldehy de	Weight % Methyl Isobutyl	Weight % Methano l	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emission s (ton/yr)	Formaldehyd e Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Methanol Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Total Emissions (ton/yr)
Line SC1:																
Unit ID EU-02D																
Kwik Dry 66	6.56	0.134700	107.47	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
W.C. Hazewood Stain	7.34	0.025600	107.47	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	69.08	16.32	0.00	0.00	0.00	0.00	85.40
Unit ID EU-02F																
Lacquer Sealer	7.56	0.067800	107.50	0.00%	50.00%	0.00%	5.00%	5.00%	0.00%	0.00	120.67	0.00	12.07	12.07	0.00	144.81
Unit ID EU-02G																
Gloss Varnish	7.61	0.079700	107.50	0.00%	19.08%	0.70%	0.00%	0.00%	0.00%	0.00	54.49	2.00	0.00	0.00	0.00	56.49
Unit ID EU-02H (Operating Scenario #1)																
Gloss Varnish	7.61	0.079700	107.50	0.00%	19.08%	0.70%	0.00%	0.00%	0.00%	0.00	54.49	2.00	0.00	0.00	0.00	56.49
Unit ID EU-02H (Operating Scenario #2)																
G.W. Borne Enamel	9.03	0.140800	107.50	0.22%	0.00%	0.00%	0.00%	0.00%	2.98%	1.32	0.00	0.00	0.00	0.00	17.84	19.16
B.W. Borne Enamel	8.75	0.151600	107.50	0.22%	0.00%	0.00%	0.00%	0.00%	3.15%	1.37	0.00	0.00	0.00	0.00	19.67	21.05
R.W. Borne Enamel	8.66	0.079700	107.50	0.00%	0.00%	0.00%	0.00%	0.00%	5.08%	0.00	0.00	0.00	0.00	0.00	16.51	16.51
Subtotal										70.45	245.97	4.00	12.07	12.07	19.67	364.22
Line SC3:																
Unit ID EU-02N																
Provincial Oil Stain	6.7	0.152560	8.13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID BB																
Provincial Oil Stain	6.7	0.060345	16.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal										0.00	0.00	0.00	0.00	0.00	0.00	0.00
Line SC2:																
Unit ID EU-02A																
W.C. Hazewood Stain	7.34	0.044000	18.74	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	20.70	4.89	0.00	0.00	0.00	0.00	25.59
Kwik Dry 66	6.56	0.231000	18.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID EU-02I																
W.C. Hazewood Stain	7.34	0.044000	18.74	78.10%	18.45%	0.00%	0.00%	0.00%	0.00%	20.70	4.89	0.00	0.00	0.00	0.00	25.59
Kwik Dry 66	6.56	0.231000	18.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID X																
Provincial Oil Stain	6.7	0.129672	6.25	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
subtotal										41.41	9.78	0.00	0.00	0.00	0.00	51.19
Line SC4:																
Unit ID EU-02Q																
Hazelwood Stain	6.78	0.043500	6.16	5.17%	0.00%	0.00%	0.00%	0.00%	0.00%	0.41	0.00	0.00	0.00	0.00	0.00	0.41
Mineral Spirits	6.42	0.063800	6.42	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit ID EU-02 R																
Sealer	7.39	0.045500	5.03	0.00%	21.34%	0.00%	3.28%	0.00%	0.00%	0.00	1.58	0.00	0.24	0.00	0.00	1.82
Varnish	7.6	0.046500	4.86	0.00%	19.24%	0.18%	0.00%	0.00%	0.00%	0.00	1.45	0.01	0.00	0.00	0.00	1.46
subtotal										0.41	3.03	0.01	0.24	0.00	0.00	3.70

Total Potential Emissions 112.27 258.78 4.01 12.31 12.07 419.11

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Company Name: Woodcrest Manufacturing, Inc.
Address : 150 E. Washington St., Peru, Indiana
Title V: T103-17193-00027
Plt ID: 103-00027
Reviewer: ERG/TDP
Date: June 3, 2003

There are six separate lines (W-1 through W-6) exhausting to Stack BH-1 which is controlled by one baghouse. Line W-5 also has emissions exhausted to one of two portable collectors.

A. Potential To Emit

		PTE After Control	PTE Before Control
*PM Control Equipment = Baghouse		ton/yr	ton/yr
Grain Loading in grains/acf	0.03	41.65	4165.0
Air Flow Rate in acf/m	36980		
Control Efficiency in %	99.0%		

* Assume all PM emission is PM10

Potential To Emit PM/PM10 (lbs/hour) = 0.03 gr/acf * 36980 acf/min * 60 min/hour * 1 lb/7000gr

Potential To Emit PM/PM10 (ton/year) = PM in lbs/hour * 8760 hour/year * 1ton /2000 lbs

Potential to Emit Before Control (ton/yr) = Potential to Emit PM/PM10 (ton/year)/(1-Control Efficiency in %)

B. Allowable Emissions

	Process Weight Rates	
	(lbs wood/hr)	(tons wood/hr)
Line W-1	4050	2.03
Line W-2	1416	0.71
Line W-3	1789	0.89
Line W-4	654	0.33
Line W-5	3152	1.58
Line W-6	2684	1.34

Pursuant to 326 IAC 6-3-2, the PM emissions from each line shall not exceed an amount determined by the following equation:

$$E = 4.10 * (P)^{0.67} \quad \text{where } E = \text{allowable emission rate in lbs/hr}$$

$$P = \text{process weight rate in tons/hr}$$

Line W-1	$E = 4.10 * (2.03)^{0.67}$	6.6 lbs/hr
Line W-2	$E = 4.10 * (0.71)^{0.67}$	3.3 lbs/hr
Line W-3	$E = 4.10 * (0.89)^{0.67}$	3.8 lbs/hr
Line W-4	$E = 4.10 * (0.33)^{0.67}$	1.9 lbs/hr
Line W-5	$E = 4.10 * (1.58)^{0.67}$	5.6 lbs/hr
Line W-6	$E = 4.10 * (1.34)^{0.67}$	5.0 lbs/hr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
1.5 MMBtu/hr Small Industrial Boiler

Page 5 of 5 TSD App A

Company Name: Woodcrest Manufacturing, Inc.
Address : 150 E. Washington St., Peru, Indiana
Title V Permit No.: T103-17193-00027
Plt ID: 103-00027
Reviewer: ERG/TDP
Date: June 3, 2003

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.5

13.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.7	0.0	0.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-02 (SUPPLEMENT D 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton